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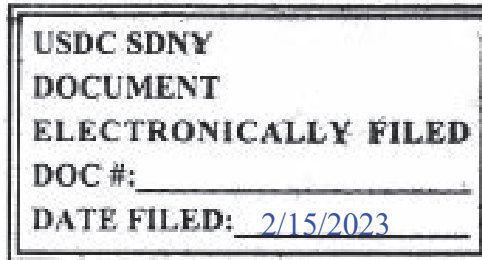
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**Admitted in NJ & NY*

February 13, 2023

Via ECF

Honorable Jennifer H. Rearden
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312



RE: Surgicare of Manhattan v. United Healthcare Insurance Company
Docket No.: 22-09695

Dear Judge Rearden,

This firm represents the Plaintiff in the above-captioned matter. On February 10, 2023, Your Honor issued an Order noting that the Defendant appears to be in default, and instructing Plaintiff to move for default judgment within two weeks.

However, on February 9, 2023, one day before Your Honor's Order, a representative for Defendant contacted Plaintiff's counsel. The representative advised that Defendant is reviewing the matter internally in an attempt to resolve the matter amicably prior to retaining outside counsel. In that regard, the representative requested an extension of Defendant's time to answer the Complaint up to and including March 20, 2023; Plaintiff consented to the request.

Plaintiff thus requests that the Court extend Defendant's time to answer until March 20, 2023, by which time Plaintiff will further update the Court if Defendant has not yet appeared or answered. As always, we thank the Court for its courtesies in this regard.

In light of Plaintiff's consent to the filing of a late answer, should Defendant appear and request permission prior to March 20, 2023, the Court will permit Defendant to answer by March 20. Plaintiff shall update the Court as to the status of this case by March 22, 2023, if Defendant has not responded to the Complaint by then.

SO ORDERED.

Very truly yours,

s/Michael Gottlieb
Michael Gottlieb

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February 15, 2023